REMARKS

I. Status of the Application

Claims 1-16 are pending in this application. In the January 11, 2007 office action, the Examiner:

A. Rejected claims 1-16 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No 7,124,397 to Mathur et al. (hereinafter "Mathur") in view of U.S. Patent No. 6,922,558 to Delp et al. (hereinafter "Delp").

In this response, claims 1 and 6 have been amended, and claims 10-15 have been canceled without prejudice. Claim 17 has been added. Applicants traverse the prior art rejections of claims 1-9 and 16, and respectfully request reconsideration of the application in view of the foregoing amendments and accompany remarks.

I. Claim 1 is Allowable

Claim 1 stands rejected as allegedly being obvious over Mathur in view of Delp. However, as will be discussed below in detail, neither Mathur nor Delp, either alone or in combination teach or suggest each and every element of the claimed invention. Accordingly, it is respectfully submitted that the rejection of claim 1 over Mathur and Delp is in error and should be withdrawn.

A.   Claim 1

Claim 1 is directed to a method of integrating a third party device into a building

control system, the building control system having a workstation running building control

system program instructions and a field panel in communication with the workstation. For

illustrative purpose, an exemplary building control system in which the method is used is

shown in Fig. 1 of the application. The system shows a workstation 22, two separately housed

field panels 26a, 26b that are in communication with the workstation 22 via a network 32, and

a number of devices 28a-28e. The method involves integrating a third party device (e.g. one

of devices 28a-28e) into the network 20.

Returning again to the general description of claim 1, the method includes providing a

user interface for the input of data regarding a third party device, and accepting data input

from the user regarding the third party device through the user interface. The method also

includes launching an integration tool in response to the data input from the user regarding the

third party device, and generating an integration file by the launched integration tool for use

by a driver associated with the third party device. The method further includes loading the

generated integration file into a field panel for use by the driver associated with the third party

device.

The amendment to claim 1 clarifies that the field panel and workstation are separately

housed. The claim would have been interpreted in such a manner without the amendment, as

field panels are generally understood to be dispersed throughout a facility, and to be separate

and distinct from the workstation. Thus, the amendment constitutes a mere clarification.

Nevertheless, explicit support for the amendment to claim 1 may be found in the specification

and drawings as filed. (See application at Fig. 1 and specification at pp.11-12 and p.15, lines 15-18).

Accordingly, the claimed invention involves execution of an integration tool to generate an integration file, and then loading the integration file into a separately housed field panel, for use by a driver associated with a third party device.

B.   Neither Reference Discloses Loading an Integration File into a Field Panel

Neither Mathur nor Delp, alone or in combination, teach or suggest the steps of "generating an integration file by the launched integration tool for use by a driver associated with the third party device", and "loading the generated integration file into the separately housed field panel for use by the driver associated with the third party device", as claimed in claim 1. Delp does not teach loading an integration file as claimed, nor does the Examiner allege that Delp teaches loading an integration file as claimed. Instead, the Examiner alleges that Mathur teaches the above-quoted steps. However, while Mathur discloses an integration tool, Mathur does *not* teach or suggest loading an integration file into a separately housed field panel. In Mathur, the integration file is used by the computer workstation, and not a separately housed device.

C.   Mathur

The system of Mathur includes a computer workstation that incorporates a human interface layer 12, an application layer 30, and object linking layer 50, and a communication inteface 70. (See Mathur at Fig. 1 and at col. 2, line 31 to col. 3, line 19). Also included in

the system are the field devices 100 that are communicably coupled to the workstation. (See Mathur at Fig. 1 and at col. 3, lines 20-31).

Mathur teaches a system that allows creation of new control "projects" that are executed by the application layer 30 of the control workstation. (*Id.* at Fig. 2). One of the operations of Mathur includes configuring the control workstation to communicate with a new remote field device 100. (*Id.* at Fig. 4). All of the configuration files with Mathur relate to the operation of the workstation itself, and are not used by any separately housed device. Instead of loading a configuration file in a field device 100, the configuration files in Mathur are retained *by the workstation* in order to allow the applications 30 to communicate with the the field devices 100. By way of example, col. 5, lines 32-46 of Mathur describe how a user interface to an annunciator panel device is created *in the workstation*. Nothing states that a configuration file is loaded to a field panel or field device.

Thus, while Mathur may disclose generating some type of integration or configuration file for a third party device, Mathur clearly fails to disclose or suggest "loading the generated integration file into [a] separately housed field panel for use by the driver associated with the third party device", as claimed in claim 1.

Because both Mathur and Delp fail to disclose "loading the generated integration file into [a] separately housed field panel", it is respectfully submitted that claim 1 is allowable over the prior art of record.

D.   The Examiner's Rejection

The Examiner has alleged the Mathur teaches "loading the generated integration file

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into the field panel", as originally claimed. In support of this allegation, the Examiner cited Figure 13 of Mathur, and col. 5, line 50 to col. 6, line 15 of Mathur. It is respectfully submitted that the cited portions of Mathur do not support the Examiner's allegation with respect to loading an integration file into a field panel. Perhaps more importantly, the cited portions of Mathur do not teach or suggest the *amended* limitation of "loading the generated integration file into [a] *separately housed* field panel".

The Examiner cited Fig. 13. Fig. 13 shows interfaces between various applications and programs in the workstation itself. Fig. 13 does not show any elements of portions of a separately housed field panel.

Moreover, the cited portions of cols. 5 and 6 discuss how various applications within the control workstation cooperate to build an interface to a field device. However, none of the cited text mentions downloading information, much less an integration file, into the field device.

Accordingly, it is respectfully submitted that portions of Mathur cited by the Examiner as teaching loading an integration file *do not* teach or suggest "loading the generated integration file into [a] separately housed field panel", as claimed in amended claim 1.

E.   Conclusion as to Claim 1

Because neither Mathur nor Delp teach or suggest "loading the generated integration file into [a] separately housed field panel", it is respectfully submitted that the obviousness rejection of claim 1 is in error and should be withdrawn.

III.   Claims 2-5

Claims 2-5 all stand rejected as allegedly being obvious over Mathur and Delp.

Claims 2-5 all depend from and incorporate all of the limitations of claim 1. Accordingly, for

at least the same reasons as those set forth above in connection with claim 1, it is respectfully

submitted that the obviousness rejections of claims 2-5 are in error and should be withdrawn.

IV.   The Rejection of Claim 6 is in Error

Claim 6 also stands rejected as allegedly being obvious over Mathur and Delp. Claim

6 is directed to a building control system that includes:

> a workstation...;
> a field panel in electronic communication with and separately housed from said
> workstation...
> a software integration tool ... operative to... load the generated application file into the
> field panel....

As discussed above, neither Mathur nor Delp teaches or suggests loading a generated

integration (or application) file to a field panel that is separately housed from the workstation.

Accordingly, for at least the same reasons as those set forth above in connection with

claim 1, it is respectfully submitted that the obviousness rejection of claim 6 is in error and

should be withdrawn.

V.   Claims 7-9

Claims 7-9 all stand rejected as allegedly being obvious over Mathur and Delp.

Claims 7-9 all depend from and incorporate all of the limitations of claim 6. Accordingly, for

at least the same reasons as those set forth above in connection with claim 6, it is respectfully

submitted that the obviousness rejections of claims 7-9 are in error and should be withdrawn.

VI.   The Rejection of Claim 16 is in Error

Claim 16 also stands rejected as allegedly being obvious over Mathur and Delp.

Claim 16 is directed to a method that includes:

> detecting a user generated modification to a field panel data element by a field panel of the building control system...
> transmitting, by the field panel, the stored appended field modification to the work station.

The Examiner relied on the teachings of Mathur to satisfy these elements. However, Mathur does not disclose transmitting "stored appended field modification data" to a workstation, particularly when the field modification data is derived from a "user generated modification to a field panel data element". In particular, Mathur does not teach that the user may modify the data at the field devices 100, and then have the field devices 100 transmit field modification data (based on the user modification) to the workstation.

In the rejection, the Examiner cites portions of Mathur that discuss the operations of the work station, and not of operations of the field devices 100. (Office Action at p.6, citing Figure 13 and col. 5, line 50 to col. 6, line 15). None of those cited portions of Mathur relate to or discuss data transmitted to, or data received from, a field device 100. As discussed above in connection with claim 1, these cited portions of Mathur relate only to the workstation.

Accordingly, for these reasons, which are related to the reasons cited above in connection with claim 1, it is respectfully submitted that the rejection of claim 16 over Mathur and Delp should be withdrawn.

VII.   New Claim 17

New claim 17 depends from claim 1 and is allowable for at least the same reasons.
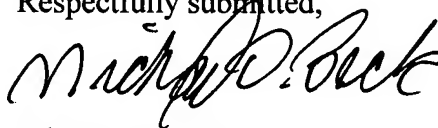
VIII.   Conclusion

For all of the foregoing reasons, it is respectfully submitted the applicant has made a patentable contribution to the art. Favorable reconsideration and allowance of this application is therefore respectfully requested.

In the event applicant has inadvertently overlooked the need for an extension of time or payment of an additional fee, the applicant conditionally petitions therefore, and authorizes any fee deficiency to be charged to deposit account 13-0014.

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